

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**STIPULATION TO TAKE CERTAIN
DEPOSITIONS ORDERED ON AUGUST
22, 2017 [DKT 1303] ON AUGUST 25, 2017
AND [PROPOSED] ORDER**

1 WHEREAS, Defendants Uber and Ottomotto (“Defendants”) moved to compel Plaintiff
2 Waymo LLC (“Waymo”) produce a witness or witnesses on Topics 5 and 8 of Defendants’ Rule
3 30(b)(6) Notice, and Waymo opposed that motion;

4 WHEREAS, on August 22, 2017, the Court granted Defendants’ motion (Dkt. 1303);

5 WHEREAS, the current fact discovery cut-off date and date for opening expert reports is
6 August 24;

7 WHEREAS, upon receipt of the Court’s order, Waymo promptly provided available dates
8 for the witnesses designated to testify on Topics 5 and 8, and provided those dates to Defendants
9 on August 22;

10 WHEREAS, the earliest date the witnesses are available after the Court’s August 22 Order
11 is August 25, and Waymo offered to make each one available on that date;

12 WHEREAS, Defendants agreed to depose Waymo’s witnesses on Topics 5 and 8 on
13 August 25.

14
15 THEREFORE, the parties stipulate as follows: Defendants will depose Waymo’s 30(b)(6)
16 designees on Topics 5 and 8 on August 25, 2017.

17
18 IT IS STIPULATED.

19
20 DATED: August 24, 2017

QUINN EMANUEL URQUHART & SULLIVAN,
LLP

21 By /s/Charles K. Verhoeven

22 Charles K. Verhoeven

23 Attorneys for WAYMO LLC

24 DATED: August 24, 2017

MORRISON & FOERSTER

25 By /s/ Arturo Gonzalez

26 Arturo Gonzalez

27 Attorneys for Uber Technologies, Inc.; Ottomotto,
28 LLC

1
2 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

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4
5 DATED: _____, 2017

Magistrate Judge Jacqueline Scott Corely

SIGNATURE ATTESTATION

Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from Arturo Gonzalez.

/s/ Charles K. Verhoeven
Charles K. Verhoeven